



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 09 2014

REPLY TO THE ATTENTION OF:

Mr. Matthew Stuckey
Chief
Permits Branch
Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

Dear Mr. Stuckey:

The U.S. Environmental Protection Agency has reviewed the draft part 70 operating permit renewal, permit number 165-33876-00001, for Duke Energy Indiana, Inc., Cayuga Generating Station, located in Cayuga, Indiana. To ensure that the source meets federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comment:

Conditions D.1.11 and D.2.11 of the draft permit establish parametric monitoring requirements for the Electrostatic Precipitator (ESP). On page 24 of the technical support document, the parameters being measured for the ESP are the number of transformer-Rectifier (T-R) sets in service, T-R primary and secondary voltages, and T-R current. In both the Technical Support Document and the draft permit, the number of T-R sets in service is the only indicator range specified while indicators for voltage and current are not. Please specify indicator ranges for T-R voltage and current in the permit or explain why measuring and recording the number of T-R sets in service is sufficient to ensure proper operation of the ESP.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Michael Langman, of my staff, at (312) 886-6867.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico".

Genevieve Damico
Chief
Air Permits Section